

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
Dallas Division

Peninsula Petroleum Far East Pte. Ltd.	§	
	§	
Plaintiff,	§	
	§	CIVIL ACTION 3:22-CV-241-L
v.	§	
	§	
Crystal Cruises, LLC	§	IN ADMIRALTY, Rule 9(h)
Star Cruises (HK) Limited	§	
	§	
Defendants, and	§	
	§	
Bank of America, National Association	§	
	§	
Garnishee.	§	

**AGREED MOTION FOR CONSENT JUDGMENT**

Peninsula Petroleum Far East Pte. Ltd. (“Peninsula”), Crystal Cruises, LLC (“Crystal”) and Mark C. Healy, assignee of Crystal Cruises, LLC (“Assignee”), Crystal and Assignee both appearing specially and restrictively and solely as Claimants of the garnishment proceeds herein, jointly move for this Court to enter judgment against Crystal and in favor of Peninsula in the form of the consent judgment filed herewith, in the amount of \$402,695.13.

The parties respectfully request this Court to grant their motion and herewith submit a draft order.

Respectfully Submitted,

/s/ Arthur R. Kraatz

Arthur R. Kraatz (*pro hac vice* pending)  
PHELPS DUNBAR LLP  
Canal Place | 365 Canal Street, Suite 2000  
New Orleans, Louisiana 70130-6534  
Telephone: 504-566-1311  
Telecopier: 504-568-9130  
[Arthur.Kraatz@phelps.com](mailto:Arthur.Kraatz@phelps.com)

Marc G. Matthews  
SDTX ID No. 705809  
Texas Bar No. 24055921  
910 Louisiana Street, Suite 4300  
Houston, Texas 77002  
Telephone: (713) 626-1386  
Facsimile: (713) 626-1388  
Email: [marc.matthews@phelps.com](mailto:marc.matthews@phelps.com)

Crystal/ Assignee’s Counsel

/s/ J. Stephen Simms

J. Stephen Simms

Simms Showers LLP

201 International Circle

Baltimore, Maryland 21030

Telephone: 443-290-8704

Fax: 410-510-1789

[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)

Scott R. Wiehle

State Bar No. 24043991

[scott.wiehle@kellyhart.com](mailto:scott.wiehle@kellyhart.com)

Joseph D. Austin

[joseph.austin@kellyhart.com](mailto:joseph.austin@kellyhart.com)

State Bar No. 24101470

KELLY HART & HALLMAN, LLP

201 Main Street, Suite 2500

Fort Worth, Texas 76102

Telephone: (817) 332-2500

Peninsula Counsel